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Amendment to Protective Order Case No. 2:20-cv-00454-MJP

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

ANYSA NGETHPHARAT and JAMES KELLEY, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY,

Defendant.

No. 2:20-cv-00454 MJP

AMENDMENT TO PROTECTIVE ORDER

The Court's Protective Order (Dkt. No. 47) is hereby amended so that Paragraph 3 of the Protective Order is deleted and replaced with the following:

3. The disclosure of Confidential Information is restricted to Qualified Persons. "Qualified Persons," as used herein, means: the Parties to this pending Lawsuit, captioned Ngethpharat v. State Farm Mutual Automobile Insurance Co., Case No. 2:20-cv-00454-MJP (W.D. Wash.); their respective counsel; counsel's staff; expert witnesses; outside service-providers and consultants providing services related to document and ESI processing, hosting, review, and production; the Court; other court officials (including court reporters); the trier of fact pursuant to a sealing order as provided in paragraph 16 below; any person who wrote or received the document, ESI, or other material in the ordinary course of employment or agency; the Parties to the lawsuit captioned Jama v. State Farm Fire and Casualty Co., No. 2:20-cv-00652 MJP (W.D. Wash.), their respective counsel, counsel's staff, and expert witnesses; and any person so designated pursuant to paragraph 4. If this Court so elects, any other person may be designated as

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1 a Qualified Person by order of this Court, after notice to the Parties. 2 3 DONE and ORDERED this 7th day of December, 2020. 4 5 Marshy Helens 6 7 The Honorable Marsha J. Pechman UNITED STATES DISTRICT JUDGE 8 Presented by: 9 s/Peter W. Herzog 10 Peter W. Herzog III (pro hac vice) Wheeler Trigg O'Donnell LLP 11 211 N. Broadway, Suite 2825 12 St. Louis, Missouri 63102 Phone: 314.326.4128 13 Fax: 303.244.1879 Email: pherzog@wtotrial.com 14 Eric L. Robertson (pro hac vice) 15 Wheeler Trigg O'Donnell LLP 370 17th Street, Suite 4500 16 Denver, Colorado 80202-5647 17 Phone: 303.244.1842 Fax: 303.244.1879 18 robertson@wtotrial.com Email: 19 s/ Matthew Munson 20 Joseph D. Hampton, WSBA #15297 Matthew Munson, WSBA #32019 21 Betts, Patterson & Mines, P.S. 22 One Convention Place 701 Pike Street, Suite 1400 23 Seattle, WA 98101-3927 Phone: 206.292.9988 24 Fax: 206.343.7053 25 jhampton@bpmlaw.com Email: mmunson@bpmlaw.com 26 Attorneys for Defendant

Amendment to Protective Order Case No. 2:20-cv-00454-MJP